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November 14, 2018 Via Electronic Filings

Chairman Ajit Pai Federal Communications Commission 445 12th Street, SW Washington, District of Columbia 20554

RE: MB Docket No. 05-311

Honorable Chairman Pai,

On behalf of TV ETC, a consortium of school districts in Clark County, Washington, I submit this letter of opposition to Docket No. 05-311, Further Notice of Proposed Rulemaking (FNPRM).

We have been providing educational programming to local cable subscribers for almost forty years. As the FCC considers changing how franchise fees are defined, please understand how this action will severely affect our local cable franchise.

Our channels are a vital communications tool to keep parents, students and the general community informed about our schools. Whether it is local school news, concerts, instructional, sports or teacher features, we offer informative and entertaining programming to our local community.

TV ETC's outstanding and educational programming comes directly from our schools, both large and small, public and private, along with the Washington State School for the Blind and the Washington School for the Deaf. In addition to important and timely programming, Comcast's support helps us provide hundreds of aspiring students and dedicated video staff

experience, growth and achievement in the media industry. Among TV ETC's many other awards and accolades, Vancouver Public Schools was honored with a Northwest Regional Emmy for one of its educational programs, *Science!* None of this would be possible without our local franchise agreement among the City of Vancouver, Clark County and Comcast, our local cable provider.

We receive capital funding for equipment through the local cable franchise agreement, and we support the operational side of our station through funding directly from school district consortium members. One is not viable without the other. Without the PEG capital support, we would no longer be able to operate.

We exist to serve our local communities. Any effort to lessen local control and collection of fees would directly hurt our schools and our community. We encourage you to reject the possible reduction in to PEG services that provide a host of benefits for our schools, viewers and residents.

Sincerely,

Tim Merlino

Jim J. Merling

On behalf of TV ETC Board of Directors Superintendent, Educational Service District 112 2500 NE 65th Ave. Vancouver, Washington 98661 (360) 750-7500

TV ETC Members:
Battle Ground Public Schools
Camas School District
Educational Service District 112
Evergreen Public Schools
Hockinson School District
Our Lady of Lourdes/St. James School
Ridgefield School District
St. Joseph's Catholic School
Vancouver Public Schools
Washington State School for the Blind
Washington School District